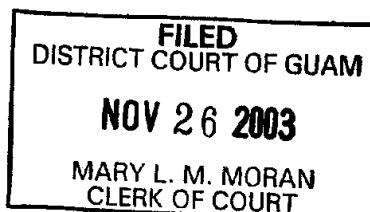


KLEMM, BLAIR, STERLING & JOHNSON  
A PROFESSIONAL CORPORATION  
1008 PACIFIC NEWS BUILDING  
238 ARCHBISHOP F.C. FLORES STREET  
AGANA, GUAM 96910  
TELEPHONE 477-7857

By THOMAS C. STERLING

Attorneys for *Defendant Imperial Suites, Inc.*



**IN THE DISTRICT COURT OF GUAM**

LA-RESA BLAS,

Plaintiff,

vs.

IMPERIAL SUITES, INC., d/b/a  
IMPERIAL SUITES HOTEL and BONG  
ROBATO,

Defendants.

CIVIL CASE NO. CV03-00027

**ANSWER OF DEFENDANT  
IMPERIAL SUITES, INC.**

COMES NOW Defendant IMPERIAL SUITES, INC. (hereinafter  
"Defendant") and in answer to the Complaint herein admits, denies  
and alleges as follows:

**COUNT I**

1. In response to paragraph 1, Defendant admits only that  
this action arises under the Constitution and laws of the United  
States and alleges a violation of the Plaintiff's rights under  
Title VII of the Civil Rights Act of 1964 as amended. Defendant  
denies generally and specifically each and every other allegation  
contained in said paragraph.

**ORIGINAL**

1           2. Defendant admits the allegations contained in  
2 paragraphs 2, 3, 5, and 6.

3           3. In response to paragraph 4, Defendant admits only that  
4 Bong Robato was the President of Imperial Suites with full  
5 supervisory authority over the day to day operations of the  
6 company. Defendant denies generally and specifically each and  
7 every other allegation contained therein.  
8

9           4. In response to paragraph 12, Defendant admits that  
10 employees were not subjected to harassment, but Defendant denies  
11 generally and specifically each and every other allegation  
12 contained therein.  
13

14           5. In response to paragraph 13, Defendant admits that the  
15 Plaintiff did not encourage, welcome or consent to sexual  
16 harassment, but Defendant denies generally and specifically each  
17 and every other allegation contained therein.

18           6. Defendant lacks sufficient information and belief to  
19 formulate a response to paragraph 7 and, basing its denial  
20 thereon, denies generally and specifically each and every  
21 allegation contained therein.  
22

23           7. Defendant denies generally and specifically each and  
24 every allegation contained in paragraphs 8, 14, 15, 16, 17, 18,  
25 19, 20, 21, and 22.

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**COUNT II**

8. In response to paragraph 23, Defendant realleges and incorporates herein by this reference its responses to paragraphs 1 through 22, inclusive.

9. Defendant denies generally and specifically each and every allegation contained in paragraphs 24 and 25.

**COUNT III**

10. In response to paragraph 26, Defendant realleges and incorporates herein by this reference its responses to paragraphs 1 through 22, inclusive.

11. Defendant denies generally and specifically each and every allegation contained in the paragraphs of Count III denominated 24, 25 and 26 of Count III.

**FIRST AFFIRMATIVE DEFENSE**

The Complaint fails to state a claim or claims upon which relief may be granted.

**SECOND AFFIRMATIVE DEFENSE**

This Court lacks jurisdiction over this action inasmuch as Imperial Suites, Inc. is not an employer under the Civil Rights Act.

**WHEREFORE,** Defendant **IMPERIAL SUITES, INC.** prays judgment as follows:

1. That Plaintiff take nothing by her Complaint;
2. For costs of suit incurred herein; and

//

1           3.    For such other and further relief as the Court may deem  
2 just and proper.

3  
4  
5           **KLEMM, BLAIR, STERLING & JOHNSON**  
6           A PROFESSIONAL CORPORATION

7           DATED: NOVEMBER 25, 2003

8           BY: 

9           **THOMAS C. STERLING**

10           Attorneys for Defendant Imperial Suites, Inc.

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